

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

FILED

2012 JUN 19 PM 2:15

CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMADO PARDO (1)  
JORGE CARRILLO (2)  
JOSE PARDO (3)  
AMANDA PARDO (4)  
TATIANA HUANG (5)  
MICHAEL MARTINEZ (6)  
ALFREDO ALVAREZ (7)  
DAVID SOSA (8)  
LUCY ESTRADA (9)  
DIONICIO SANCHEZ (10)  
CHRIS MIER (11)  
TERRY AYERS (12)  
KILPATRICK WILLIAMS (13)  
LEAH DAY (14)  
JEFFREY FINN (15)

Defendants

CRIMINAL NO.

INDICTMENT

[Ct. I - Vio: 21 U.S.C. §846- Conspiracy to  
Possess with Intent to Distribute Heroin]

FILED UNDER SEAL

BY                      DEPUTY  
**A12 CR 234 SS**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Conspiracy to Possess with Intent to Distribute and Distribution  
of a Controlled Substance  
(Violation of 21 U.S.C. § 846)**

Beginning on or about May 1, 2011, and continuing through at least June 15, 2012, in the Western District of Texas and elsewhere, **AMADO PARDO, JORGE CARRILLO, JOSE PARDO, AMANDA PARDO, TATIANA HUANG, MICHAEL MARTINEZ, ALFREDO ALVAREZ, DAVID SOSA, LUCY ESTRADA, DIONICIO SANCHEZ, CHRIS MIER, TERRY AYERS, KILPATRICK WILLIAMS, LEAH DAY, and JEFFREY FINN,** defendants, did intentionally and knowingly combine, conspire, confederate, and agree together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute and distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(A).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**I.**

**Controlled Substance Forfeiture Statutes and Violation**

**[21 U.S.C. § 846 and subject to forfeiture pursuant to 21 U.S.C. §§ 853(a)(1) and (2)]**

As a result of the foregoing criminal violation as set forth in Count I of the Indictment, which is punishable by imprisonment for more than one year, **DEFENDANTS AMADO PARDO, JORGE CARRILLO, JOSE PARDO, AMANDA PARDO, TATIANA HUANG, MICHAEL MARTINEZ, ALFREDO ALVAREZ, DAVID SOSA, LUCY ESTRADA, DIONDICIO SANCHEZ, CHRIS MIER, TERRY AYERS, KILPATRICK WILLIAMS, LEAH DAY, and JEFFREY FINN** shall forfeit any and all right, title, and interest in the below-described property to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (2), which state the following:

**21 U.S.C. § 853.**

(a) Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law—

(1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

(2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

This Notice of Demand for Forfeiture includes, but is not limited to, the property described below.

**II.**

**Real Property**

As a result of the foregoing criminal violation as set forth in Count I of the Indictment, **DEFENDANTS AMADO PARDO and AMANDA PARDO** shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853(a)(1) and (2), the following:

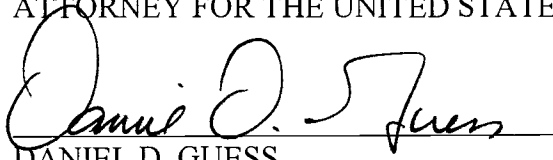
**A. All right, title and interest of DEFENDANTS AMADO PARDO and AMANDA PARDO in the following real property is subject to forfeiture to the United States of America:**

1. Real property located and situated at **404 Milton Street, Austin, Travis County, Texas**, including any and all buildings, appurtenances and improvements thereon and any and all surface rights, title and interests, if any, and more fully described as: LOT 1, BLOCK "A", GUS F. BECKER'S SUBDIVISION, AN ADDITION IN TRAVIS COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT THEREOF RECORDED IN BOOK 3, PAGE 115, PLAT RECORDS, TRAVIS COUNTY, TEXAS. RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY FOR ALL OF THE AFOREMENTIONED REAL PROPERTY: Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments, other than liens and conveyances, that affect the property.
2. Real property located and situated at **406 Milton Street, Austin, Travis County, Texas**, including any and all buildings, appurtenances and improvements thereon and any and all surface rights, title and interests, if any, and more fully described as: LOT 2 OF THE MAYITO SUBDIVISION IN TRAVIS COUNTY, TEXAS, ACCORDING TO THE PLAT RECORDED AS DOCUMENT NO. 200700150 OF THE OFFICIAL RECORDS OF TRAVIS COUNTY, TEXAS. RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY FOR ALL OF THE AFOREMENTIONED REAL PROPERTY: Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments, other than liens and conveyances, that affect the property.
3. Real property located and situated at **1615 S. 1st Street, Austin, Travis County, Texas**, including any and all buildings, appurtenances and improvements thereon and any and all surface rights, title and interests, if any, and more fully described as: LOT 7, BLOCK 3, D.W. BOULDIN'S ADDITION TO THE CITY OF AUSTIN, A SUBDIVISION IN THE CITY OF AUSTIN, TRAVIS COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT OF RECORD IN VOLUME 1, PAGE 78, PLAT RECORDS, TRAVIS COUNTY, TEXAS. RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY FOR ALL OF THE AFOREMENTIONED REAL PROPERTY: Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments, other than liens and conveyances, that affect the property.

4. Real property located and situated at **1619 S. 1st Street, Austin, Travis County, Texas**, including any and all buildings, appurtenances and improvements thereon and any and all surface rights, title and interests, if any, and more fully described as: LOTS 8 AND 9, BLOCK 3, D.W. BOULDIN'S ADDITION TO THE CITY OF AUSTIN, TRAVIS COUNTY, TEXAS, ACCORDING TO THE MAP OR PLAT RECORDED IN VOLUME 1, PAGE 78, PLAT RECORDS, TRAVIS COUNTY, TEXAS. RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY FOR ALL OF THE AFOREMENTIONED REAL PROPERTY: Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments, other than liens and conveyances, that affect the property.

**ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002**

ROBERT PITMAN  
ATTORNEY FOR THE UNITED STATES

A handwritten signature in black ink, appearing to read "Daniel D. Guess", is written over a horizontal line.

DANIEL D. GUESS  
Assistant United States Attorney